

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

THOMAS D. SELGAS (1)  
MICHELLE L. SELGAS (2)  
JOHN O. GREEN (3)

CRIMINAL NO. 3-18-CR-356-S

**GOVERNMENT'S UNOPPOSED MOTION TO CONTINUE TRIAL DATE**

The United States of America, by and through undersigned counsel, submits this unopposed motion to continue the trial date. The trial of the above listed defendants is scheduled to begin on September 23, 2019. The undersigned recently learned that his father, who is in a nursing home, might only have a few days to live. This will necessitate travel outside of Dallas. Accordingly, to deal with this family situation the government is requesting a continuance to the trial date.

All parties are due to have a telephone conference with the court on September 13, 2019, and a new trial date suitable to the court and the parties can be determined.

**CONCLUSION**

For the above stated reasons the government requests the court grant this unopposed motion to continue the trial date.

Respectfully Submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY

By: /s/ Robert A. Kemins  
ROBERT A. KEMINS  
Massachusetts Bar No. 267330  
Trial Attorney  
U.S. Dept. of Justice, Tax Division  
717 N. Harwood, Ste. # 400  
Dallas, TX 75201  
(214) 880-9781  
[Robert.A.Kemins@usdoj.gov](mailto:Robert.A.Kemins@usdoj.gov)

MARA A. STRIER  
Florida Bar No. 644234  
Trial Attorney  
U.S. Dept. of Justice, Tax Division  
150 M Street, NE  
Mail Stop: 1.1505  
Washington, DC 20002  
(202) 514-5886  
[Mara.A.Strier@usdoj.gov](mailto:Mara.A.Strier@usdoj.gov)

**CERTIFICATE OF CONFERENCE**

On September 12, 2019, the undersigned conferred with all defense counsel who stated they do not oppose this motion.

/s/ Robert A. Kemins  
Robert A. Kemins  
Trial Attorney  
Tax Division, United States Department of Justice

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 12, 2019, the foregoing document was filed using ECF, which will notify all counsel of record.

/s/ Robert A. Kemins

Robert A. Kemins

Trial Attorney

Tax Division, United States Department of Justice